

**Revised DON Guidance for  
Marking Documents Containing  
Personally Identifiable Information (PII)**

1. Privacy information is a category of Controlled Unclassified Information (CUI). There are eight defined privacy sub-categories (listed later in this guidance). You'll notice that the terms "category" and "sub-category" are used interchangeably in the DoD and DON guidance.

This guidance provides marking instructions for the following document types that contain PII: emails, memos, spreadsheets, briefings and presentations.

This guidance does not attempt to provide marking instructions for DON forms, naval messages, or other categories of CUI. Contact those programs for guidance.

2. The procedures for marking emails and documents containing PII have changed. The privacy marking, "FOR OFFICIAL USE ONLY (FOUO) – PRIVACY SENSITIVE. Any misuse or unauthorized disclosure may result in both civil and criminal penalties" will no longer be used, and documents containing PII will be marked per the guidance below.

Many in the past added the above FOUO privacy statement or something similar to all of their emails whether or not the email contained PII by creating an email template. This should not be done. There is no equivalent CUI statement.

To be clear, the above privacy marking and "FOUO" alone are no longer valid markings and should not be used.

If a document doesn't contain CUI then it should not be marked "CUI". If the CUI marking is used, you should be able to identify the specific CUI in the document.

3. The general rule for all documents containing PII is to mark the document at the top or "banner" with "CUI" and at the bottom or "footer" with "CUI". In addition, email subject lines should also be marked "CUI".

Do not add additional descriptive wording to the "CUI" marking. For example, do not use "CUI-Privacy", "CUI-PII", or similar modifiers.

Do not go back and re-mark existing (i.e, pre-CUI program or legacy documents). If information from these "old" documents is used to create a new document, then mark the new document according to CUI program marking policy.

4. In addition to marking documents at the top and bottom with "CUI" a CUI "Designation Indicator Block" is required at the bottom of the document's first page within the "CUI" banner and footer markings. DoD guidance directs that this block be located at the lower right of the page. This isn't always possible. The important thing is that the block is present.

This block includes organization, office, CUI category, dissemination information, and POC information.

Please see the the CUI resource below on how to create and use the CUI "Designation Indicator Block".

5. Portion markings “(U)” and “(CUI)” (i.e., for paragraph markings) are optional when marking documents, but if used, they must be used throughout the document. Portion markings have not been used in the past when a document contains PII so recommend not using them in most cases. There may be times when they are appropriate and/or necessary.

6. Documents containing PII must only be accessible to those with an official DoD/DON need to know. This has not changed.

Transmissions of PII must be digitally signed and encrypted. This has not changed.

***Note: DODI 5200.48, Controlled Unclassified Information (CUI) discusses reporting requirements if CUI is compromised (i.e. a PII breach); a new term that replaces “need to know”; a CUI cover sheet; and CUI training. The DON Privacy program should continue to follow the DoD/DON Breach Response Plans; continue to use the DoD Privacy Act Data Cover Sheet, DD Form 2923; and complete the mandatory annual DON Privacy Awareness Training. If and when changes are directed by the Defense Privacy and Civil Liberties Transparency Division (DPCLTD), this guidance will be updated.***

## Constructing Your CUI Designation Indicator Block

1. This block is placed on the first page of each document at the bottom right, if possible, between the header and footer CUI markings.
2. It is recommended that you create your block and save it in a convenient location so you can cut and paste it into your document when needed. At times you may need to change it slightly for the specific document, but you won't have to start from scratch.

The required elements that make up the block are:

Controlled by:

Controlled by:

CUI Category:

Distribution/Dissemination Control:

POC:

The following guidance is provided when creating your block. Remember, this is DON guidance as it relates to privacy information only as a category of CUI:

1. The first "Controlled by" line should always be "Department of the Navy" or "DON". "DON" is acceptable if it's clear to recipients that "DON" stands for "Department of the Navy".
2. The second "Controlled by" line should be how you identify your office. Some examples might be:

- a. DON AA HR
- b. BUPERS Code 074
- c. HQMC SJA JLA

Adding "SECNAV", "NAVY" or "OPNAV", or "USMC" prior to your office information may further help identify your office.

3. The privacy CUI Category line must be one of the following privacy "sub-category" acronyms:

CONTRACT	for Contract Use
DREC	for Death Records
PRVCY	for General Privacy
GENETIC	for Genetic Information
HLTH	for Health Information
PRIIG	for Inspector General Protected
MIL	for Military Personnel Records
PERS	for Personnel Records
STUD	for Student Records

In most cases, it is recommended to use “PRVCY” which stands for “General Privacy” (see listing above). Remember, this guidance is for privacy information only. If your document contains other non-privacy categories (e.g., Legal, Financial, Law Enforcement, etc.) you would list those here also. Each of these categories have their own set of sub-categories that have their own acronyms.

4. For the “Distribution/Dissemination Control” line it is recommended that you use “FEDCON” which includes federal, military, and contractor government employees (i.e., all government employees).

Reiterating, documents containing PII should only be sent to those with an official DoD/DON need to know.

5. For the “POC” line the email originator should include their name and contact information (i.e., office email and/or office phone number). Note: When adding a CUI Designation Indicator Block to a memo, presentation, or spreadsheet, it is acceptable to make the originating office the POC since individuals come and go and the purpose is to be able to contact the originator.

An example of a complete privacy CUI Designation Indicator Block follows:

Controlled by: Department of the Navy

Controlled by: OJAG Code 13

CUI Category: PRVCY

Distribution/Dissemination Control: FEDCON

POC: CDR Jane Doe, jane.doe@navy.mil, 703-555-5555

## CUI Markings for Emails containing PII

Subject line will be marked "CUI:".

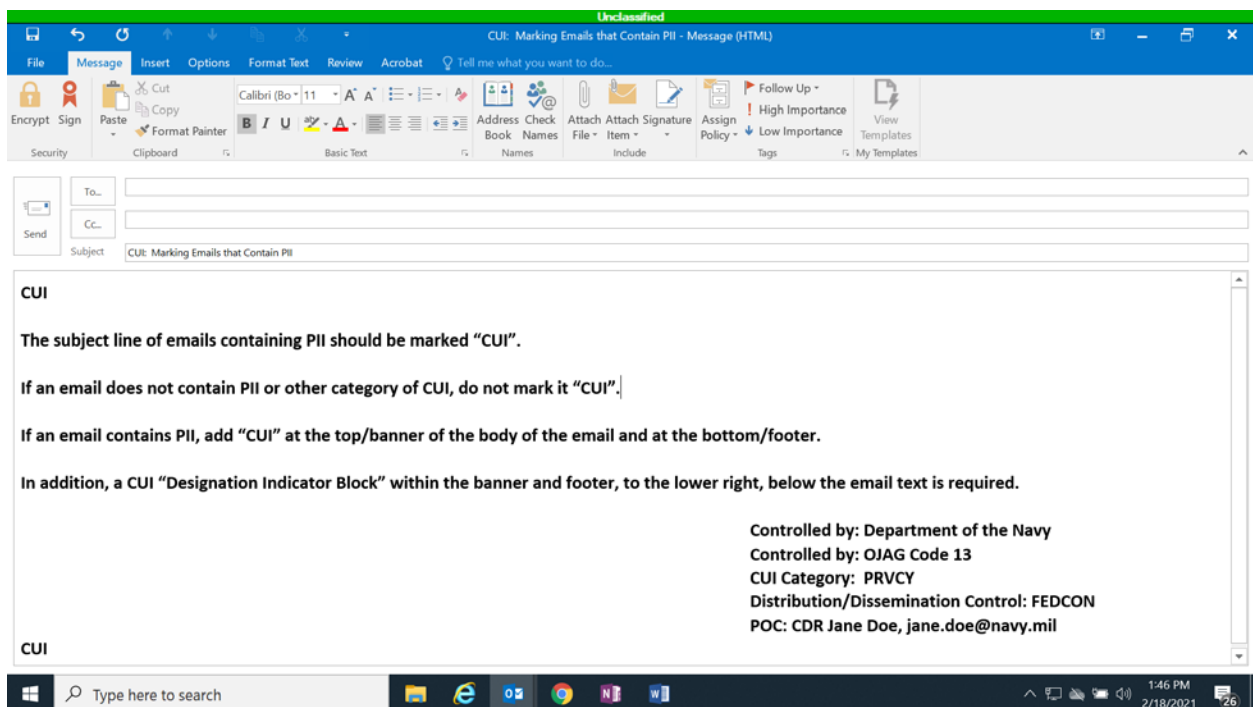
Banner (i.e., header) and footer of email body will be marked "CUI".

A CUI "Designation Indicator Block" will be added at the bottom of the email body (within the banner and footer "CUI" markings, to the right if possible). *See the additional resource page above for how to create your own Designation Indicator Block.*

Portion markings "(U)" and "(CUI)" are optional, but if used, will be used throughout the email.

If the body of an email does not contain CUI, but there is an attachment that does contain CUI, the subject line of the email should be marked "CUI". The body would not be marked. Both the attachment's file name and the document itself would be marked "CUI", and the document would have a Designation Indicator Block.

Email example:



## CUI Markings for Memos Containing PII


Banner (i.e., header) and footer of each page will be marked “CUI”.

A CUI “Designation Indicator Block” will be added at the bottom of the first page to the lower right (within the banner and footer “CUI” markings). *See the additional resource page on creating your Designation Indicator Block above.*

Portion markings “(U)” and “(CUI)” are optional, but if used, will be used throughout the presentation.

All other pages after the first page will be marked “CUI” at the top and bottom.

Memo example:

 <p>CUI</p> <p>DEPARTMENT OF THE NAVY CHIEF INFORMATION OFFICER 1000 NAVY PENTAGON WASHINGTON, DC 20356-1000</p> <p>Controlled by: Department of the Navy Controlled by: OJAG Code 13 CUI Category: PRVCY Distribution/Dissemination Control: FEDCON POC: CDR Jane Doe, jane.doe@navy.mil, 703-555-5555</p> <p>CUI</p>	<p>CUI</p> <p>2</p> <p>CUI</p>
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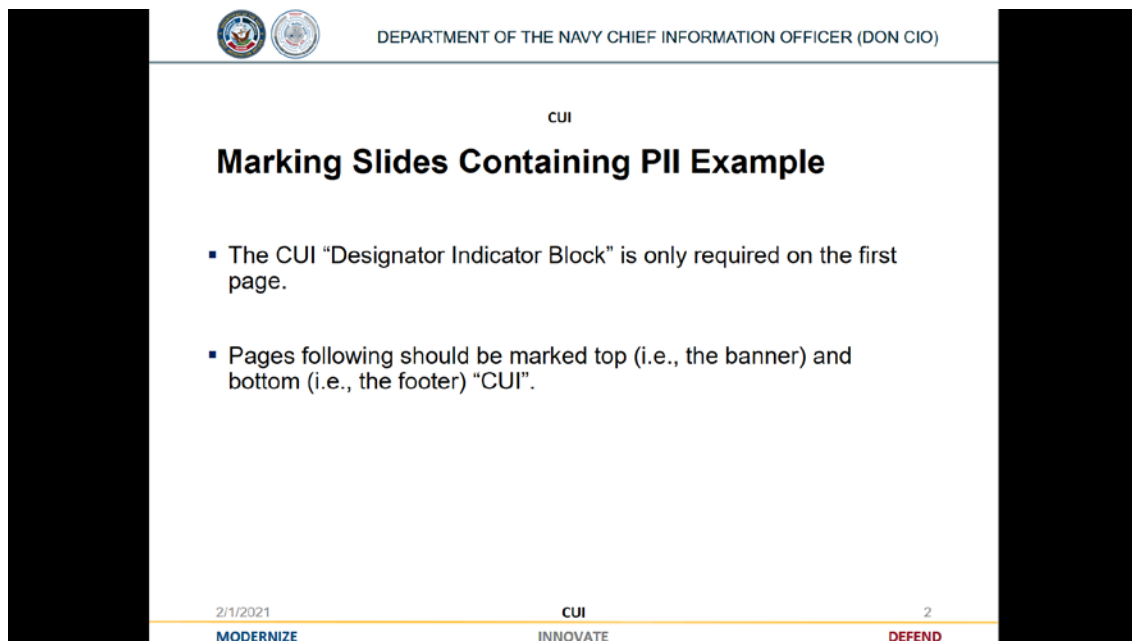
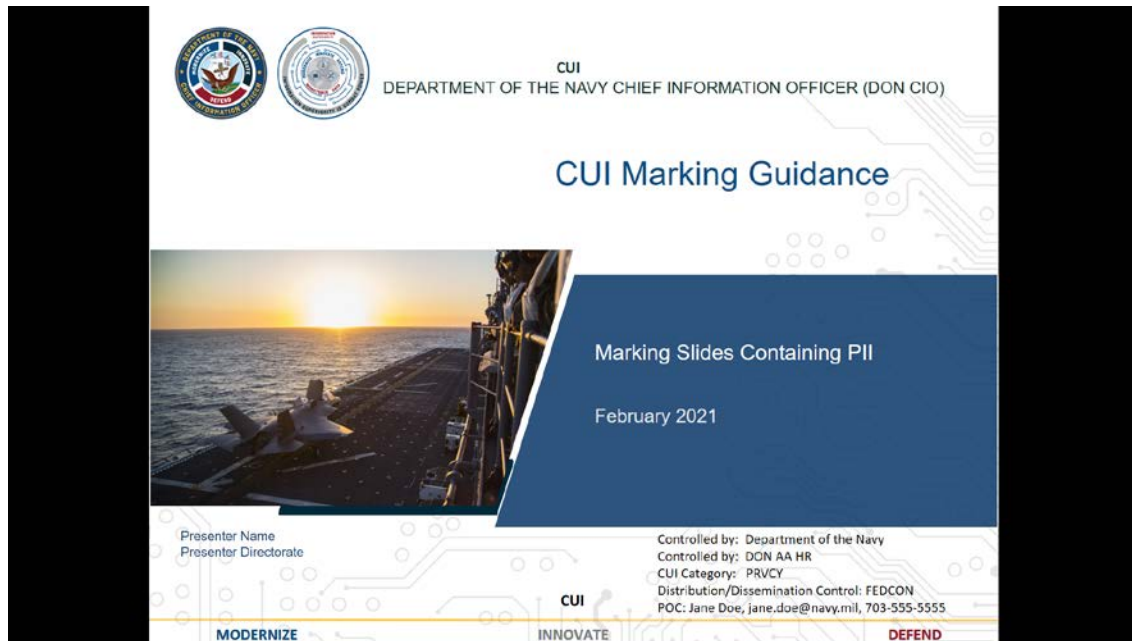
## CUI Markings for Presentations (e.g., PowerPoint) Containing PII

Banner (i.e., header) and footer of each page will be marked “CUI”.

A CUI “Designation Indicator Block” will be added at the bottom of the first page to the lower right (within the banner and footer “CUI” markings). *See the additional resource page on creating your Designation Indicator Block above.*

Portion markings “(U)” and “(CUI)” are optional, but if used, will be used throughout the presentation.

Presentation example:



## CUI Markings for Spreadsheets (e.g., Excel) Containing PII

Banner (i.e., header) and footer of each page within each tab will be marked “CUI”.

A CUI “Designation Indicator Block” will be added at the bottom right of the first page of each tab containing PII (within the banner and footer “CUI” markings). *See the additional resource page on creating your Designation Indicator Block above.*

Each tab containing PII should be labeled CUI followed by the tab name.

Spreadsheets aren’t as easy to mark as other documents. Please try to meet the intent.

Spreadsheet example:

